DOCUMENT RESUME

ED 147 441 UD 017 770

TITLE Legislative Report; National Advisory Council on the Education of Disadvantaged Children.
INSTITUTION National Advisory Council on the Education of Disadvantaged Children, Washington, D.C.
PUB DATE Sep 77
NOTE 30p.

EDRS PRICE MF-$0.83 HC-$2.06 Plus Postage.
DESCRIPTORS Citizen Participation; Compensatory Education; Educational Finance; *Educational Legislation; *Educationally Disadvantaged; Evaluation; *Government Role; *Minority Group Children; Needs Assessment; Parent Participation; *Program Content
IDENTIFIERS *Elementary Secondary Education Act Title I

ABSTRACT

This report enumerates principles which should be considered important to any legislation designed to provide educational services to disadvantaged children. It is recommended that the primary objective of Title I programs be to raise the educationally disadvantaged child's level of achievement in the area of the basic skills. It is recommended that the Federal Government exercise a direct responsibility for special groups of children where local or state obligation is not acknowledged or existent. It is recommended that the funding formula be revised to simplify economic criteria and collection of statistical data on poverty children; provide uniform criteria and appropiate allocation procedures for local districts whether organized on a state, county, or district basis, and; provide adequate allocations to urban areas with high concentrations of low income families. It is recommended that Title I legislation require an individualized needs assessment. Recommendations are also made in the following areas: (1) parent involvement, (2) citizen participation, (3) evaluations and technical assistance, (4) audits and sanctions for noncompliance and (5) state administrative costs. A summary of past council recommendations (1966-1976) is provided. (Author/AM)

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ED147441

LEGISLATIVE REPORT

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NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN

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SEPTEMBER 1977

TITLE I—FINANCIAL ASSISTANCE TO LOCAL EDUCATIONAL AGENCIES FOR THE EDUCATION OF CHILDREN OF LOW-INCOME FAMILIES

DECLARATION OF POLICY

Sec. 101. In recognition of the special educational needs of children of low-income families and the impact that concentrations of low-income families have on the ability of local educational agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in the following parts of this title) to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children.

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NATIONAL ADVISORY COUNCIL

Sec. 148. (a) There shall be a National Advisory Council on the Education of Disadvantaged Children (hereinafter in this section referred to as the "National Council") consisting of fifteen members appointed by the President, without regard to the provisions of title 5, United States Code, governing appointment in the competitive service, for terms of three years, except that (1) in the case of initial members, five shall be appointed for terms of one year each and five shall be appointed for terms of two years each, and (2) appointments to fill vacancies shall be only for such terms as remain unexpired. The National Council shall meet at the call of the Chairman.

(b) The National Council shall review and evaluate the administration and operation of this title, including its effectiveness in improving the educational attainment of educationally deprived children, including the effectiveness of programs to meet their occupational and career needs, and make recommendations for the improvement of this title and its administration and operation. These recommendations shall take into consideration experience gained under this and other Federal educational programs for disadvantaged children and to the extent appropriate, experience under other public and private educational programs for disadvantaged children.

(c) The National Council shall make such reports of its activities, findings, and recommendations (including recommendations for changes in the provisions of this title) as it may deem appropriate and shall make an annual report to the President and the Congress not later than March 31 of each calendar year. Such annual report shall include a report specifically on which of the various compensatory education programs funded in whole or in part under the provisions of this title, and of other public and private educational programs for educationally deprived children, hold the highest promise for raising the educational attainment of these educationally deprived children. The President is requested to transmit to the Congress such comments and recommendations as he may have with respect to such report.

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LEGISLATION REPORT

DEC 19 1977

INTRODUCTION

During the 95th Congress, Title I, Elementary and Secondary Education Act will face a most critical reexamination on reauthorization of the law.

The National Advisory Council on the Education of Disadvantaged Children (NACEDC) believes it necessary to contribute to that reexamination. It has gained a unique perspective from frequent interchange with students, parents, teachers, administrators, government officials, researchers and others involved in Title I. This report contains an enumeration of principles which should be considered important to any legislation designed to provide educational services to disadvantaged children (hereafter referred to as the child). Those components of Title I which have proven successful should be retained.

Significant past recommendations contained in previous reports (1966-1976) are appended.

PROGRAM OBJECTIVES AND FUNDS DISTRIBUTION

The NACEDC recommends that the primary objective of Title I programs be to raise the educationally disadvantaged child's level of achievement in the area of the basic skills (reading, mathematics, and language arts).

The stated objective of Title I should be to raise the child's level of achievement in reading, mathematics and language arts. Noninstructional Title I services which are not designed to raise educational attainment dilute the priority which must be placed on the basic skills. Where Title I programs are specific in purpose and design, they are more effective and can be better assessed. Effectiveness can be improved by a greater specification of the expected outcomes rather than of the procedures to be used.

The NACEDC recommends that there be a limitation on the use of Title I funds for support services.

The determination of the child's educational needs may comprise an identification of instructional and supportive services. Both types of services are important to the overall educational development of the child. There is a higher probability that more supportive services (nedical/dental, nutrition, transportation, etc.) are necessary for children of very poor families.[1/] Title I funding of support services should be used only temporarily, if needed, to expedite objectives of educational achievement until more appropriate resources can be provided.

The NACEDC recommends that the use of Title I funds for capital construction of facilities be specifically prohibited.

Considerable attention has been given by school officials in many areas to the economical use of facilities to offset declining enrollments and rising maintenance costs. In isolated instances where facility construction, renovation, repair, or improvement is deemed necessary, funds are available from more appropriate local, state or federal resources.[2/] These alternative sources of funds should be used by state and local educational administrators.

The NACEDC recommends that federal funds for services to the educationally disadvantaged continue to be distributed to states and local educational agencies on the basis of economic criteria and then utilized within the eligible program locations on the basis of highest educational need.

The members agree with the original underlying dual premises of Title I. First, there is a correlation between educational and economic deprivation. Secondly, high concentrations of low income families prevent local educational agencies from having sufficient resources to provide adequate programs for their educationally disadvantaged children.

FEDERAL RESPONSIBILITY FOR SPECIAL CHILDREN

The NACEDC recommends that the Federal Government exercise a direct responsibility for special groups of children (migrant, nonpublic school, American Indian, neglected and delinquent) where local or State obligation is not acknowledged or existent.

Education in the United States has been fundamentally structured upon a duality of local and state responsibility. In addition, public education has developed management and financing procedures based upon the resident child in attendance.

Problems of responsibility and service to the child often arise when a student is considered a nonresident or is not in attendance at a public school. Thus, after appropriate procedures and final

determination by the Commissioner of Education, federal financing should be modified. The Federal Government should reserve the right to exercise direct or special provisions of educational funding to the agency it determines to be most appropriate and responsible for serving the special group of children.

The *migrant child*, seen as an educational transient, cannot be viewed as the ongoing responsibility of a district or state other than for the time that he or she is present in that area. Such a pupil will move from district to district and state to state in the course of the school year. Often, the current school district of residence or the state is negligent in its responsibilities to provide the adequate educational services necessary for the migrant child. As transients, with no local status as resident constituents little recourse is available for migrants to alleviate such oversights. Migrant children are ones for whom the Federal Government should retain the right of providing direct funding to a responsive local agency for administration of special services. Funds for this purpose should be directly proportional to the number of migrant children to be served and the cost incurred by the local or state educational agency of residence.

The *American Indian child* the beneficiary of a unique cultural heritage has often failed to receive those necessary services which promote full educational development. As the Indians continue to assume greater control of their nonreservation, reservation and

boarding schools under P.L. 93-368, the Indian Self-Determination and Education Assistance Act, it is expected that programs will respond to the cultural, linguistic, social and economic needs of their children. The historical relationships of the tribes and nations to the Federal Government have created a unique responsibility beyond the local and state levels. This has established the necessity of a special and direct interface of Indian educational programs to the Federal Government.

Neglected and delinquent children in institutions are generally deprived of social and educational benefits which are enjoyed by the noninstitutionalized child. State and local educational agencies are responsible for providing educational services to these children. However, additional services may also be needed to overcome past educational disadvantagement.

In fiscal year 1977, state educational agencies were allocated $28,841,151 of Title I funds to serve 71,531 neglected or delinquent children in state correctional institutions.[3/] This amount is significant and should be effectively administered. In instances of state or local noncompliance to serve these children a provision for direct funding for educational services should be included in the Title I law. This provision should allow for appropriate withholding of funds when necessary. A final determination should be made by the Commissioner for an appropriate alternative agency to serve neglected, delinquent or children in state institutions.

Some Title I eligible *children enrolled in nonpublic* schools may need to rely on greater assistance from the Federal Government. Differences among the states in their laws, educational practices and community attitudes sometimes affect the provision of services to eligible children enrolled in nonpublic school. Where this obstacle militates against equitable Title I participation, the Federal Government must assume that responsibility. Such action should be taken only when there has been a final determination by the Commissioner that the local or state educational agency with primary responsibility has substantially failed to provide the necessary services.

The bypass provision of the current Title I law is an instrument of response to this variation among states. This is an effective and acceptable federal alternative where such a situation exists. The procedures allow all parties involved ample opportunity to respond before a final determination is made by the Commissioner.

ESEA TITLE I FUNDING FORMULA

The NACEDC recommends that the funding formula be revised to simplify economic criteria and collection of statistical data on poverty children; provide uniform criteria and appropriate allocation procedures for local districts whether organized on a state, county or district basis, and; provide adequate allocations to urban areas with high concentrations of low income families.

The formula is a mechanism for financing the delivery of Title I services to needy children. Its present structure has created debates among urban, rural, regional and intrastate interest groups which have resulted in a concentration on dollars rather than children. The formula has been a distracting element in the program to serve children who reside in school districts with high concentrations of low income families.

Accurate assessment and application of the most current census data is a necessity for formula allocations. The advent of the five-year mini-census is a step toward this goal. In addition, many school districts which now employ various computer projected estimates of student populations and characteristics for their planning purposes can forecast with reasonable accuracy Title I eligibility data. A nationwide system should be explored by the Office of Education and, if feasible, employed in the funds allocation process.

The current complexity of the formula data base had produced late allocations each year. The NACEDC recommends that the U.S. Office of Education employ a firm cutoff date by which accurate data must be received for Title I allocations.

The current procedure which bypasses the state in favor of the county level does not allow equalization within a state. The current formula allocates funds at the county level, with sub-county allocations carried out by state educational agencies with the U.S. Office of Education's approval. The allocation should be shifted to the state level. State educational agencies could then allocate funds on the basis of the most current counts of children needing services by district.

The current formula is not sensitive to the acute needs of rural and territorial areas. This results in allocations disproportionate to the wide range and intensity of services needed.

The formula should reflect regional cost differentials usually not covered in routine mechanisms of formula allotments. Alaska, Hawaii and the territories are examples of this disparity which presently exist. The NACEDC recommends a differential in allotment for Alaska, Hawaii and the territories to address extreme disparities of costs in providing services comparable to those provided in the contiguous states; such a distinction should reflect the current cost of living differential for federal employees.

INDIVIDUALIZED NEEDS ASSESSMENT

The NACEDC recommends that Title I legislation require an individualized needs assessment.

Multi-faceted Title I programs have been designed to render educationally related services to the child. Many of these services, while appropriate for some portion of the enrolled students, are not suitable or necessary for every eligible child enrolled in a Title I program.

The present law provides encouragement for a written individualized educational plan agreed upon jointly by the local educational agency, a parent or guardian, and when appropriate the child. The intention of such a provision was to encourage the organized planning of proper educational services to each child. It would also serve to help reduce the likelihood of duplication or omission of necessary services. An individualized educational needs assessment should form the basis for the determination of all educational services necessary for the child's development. It should specifically identify the types of Title I services to be delivered. Individualized needs assessment is prerequisite to effective educational planning. Written individualized needs assessment and educational plans should be required.

The NACEDC recognizes the relationship of all of a child's needs to his educational attainment. It does not, however, view Title I as the sole source for providing the range of services which may be necessary. Where the educational needs assessment identifies a need of a noninstructional nature, other resources should be utilized.

PARENT INVOLVEMENT

The NACEDC recommends that any compensatory education legislation contain components which provide for a direct involvement of parents in an advisory role to the overall program serving their children.

The Council has confirmed the importance of the home/school relationship through its discussions with local compensatory education program administrators, teachers, parents and students. It has concluded that the achievement potential and complete educational growth of the child in elementary and secondary schools is enhanced by parental involvement in the educational process.

The child has, in general, less opportunity for meaningful educational experiences than his more affluent fellow students. Knowledgeable adult supervision, access to educationally stimulating activities and resources and social development activities are examples of meaningful educational experiences often denied the child. The lack of meaningful educational experiences limit a child's readiness for the school curriculum. This could continue to be a limiting factor throughout his life unless there is effective intervention such as that provided by compensatory education programs.

Parental involvement in a child's educational program will help the parent to understand the educational needs and activities necessary to meet those needs. The parent may then serve to increase the effectiveness of the compensatory education programs.

Cultural differences between the child's home and school may create an educational disadvantagement for the child in the classroom. Parental involvement in the child's curriculum increases the teacher's and administrator's understanding of cultural factors which influence educational attainment. It also provides the parent with insight into the important role of the home in enhancing the child's education.

Parental involvement in the overall program effort, in an advisory capacity, is an essential element for educational growth and achievement. Parents immediate understanding of environmental conditions will contribute to the planning of more effective programs. Parental involvement also acts as an extra-institutional force for change and improvement in the educational services provided to children.

Principals and other educational administrators must recognize that parents of disadvantaged children frequently experience a variety of hardships which tend to limit their participation in the education of their children. Planning of parent activities should reflect efforts to overcome limitations of time (especially for single parent families), working schedules, or access to transportation, in providing programs to train and utilize parents and thereby enhance the opportunity for their involvement.

CITIZEN PARTICIPATION

The NACEDC recommends that legislation encourage citizen participation at the state and local educational levels to facilitate the planning, monitoring and evaluation of Title I programs.

Many of the objectives of Title I programs can best be accomplished with the assistance of broadly representative citizen participation at the state and local levels. This representation could be drawn from parents of eligible children, private industry, state economic and manpower development agencies, community institutions of higher education, experts in educational programs for disadvantaged children, local public and nonpublic educational agencies, and the general public.

Such groups should be permitted to advise the state educational agency and the state legislature on the development of Title I policy matters including the preparation of long range and annual program plans as well as:

(1) The accountability of state and local Title I programs;

(2) The comparability of services to the children in attendance;

(3) The coordination of Title I program activities with other federal, state and local programs to achieve the maximum educational benefit from the dollars spent;

(4) The adequacy of Title I programs designed to meet the needs of special children for whom local or state responsibility is lacking or unfeasible; and,

(5) The statewide testing program utilized in needs assessment.

EVALUATIONS AND TECHNICAL ASSISTANCE

The NACEDC recommends that funds allocated for national evaluations be reduced.

NACEDC has stated that the mushrooming educational evaluations at the national level are not cost effective.[4/] These evaluations do not provide a correlative amount of assistance to the decisionmaking process affecting educational programs for disadvantaged children.

The NACEDC recommends that national evaluation efforts be limited to developing uniform Title I program standards, evaluation instruments and reporting procedures.

State and local educational agencies may then implement evaluations of program effectiveness and provide the Federal Government with the desired information on Title I programs.

The NACEDC recommends that appropriations for Title I technical assistance to the U.S. Office of Education and the ten Office of Education regional offices be increased.

Increased technical assistance is needed at the level of service to the child. Regional offices currently assist state and local educational agencies in the planning, application, operation and administration of Title I programs. The effectiveness of these activities is severely limited by present manpower and budget allocation limitations. Sufficient budget allocations would permit regional program specialists to guide administrators toward

accomplishment of their compensatory education objectives. Such specialists may participate in the preparation of program reports and program reviews to assure state and local attention to the needs of the children to be served.

TITLE I AUDITS AND SANCTIONS FOR NONCOMPLIANCE

The NACEDC recommends that Health, Education, and Welfare Title I audit policies and procedures be revised to, (1) reduce unnecessary paperwork; (2) resolve audit exceptions in a timely manner; and, (3) confine audit activities to compliance with federal requirements.

The Health, Education, and Welfare Audit Agency could be the most effective vehicle for insuring local compliance. The present policies and procedures utilized by the audit agency severely limit such effectiveness. Extensive revisions are necessary.

Health, Education, and Welfare auditors, who spotcheck state and local educational agencies, often do not fully understand the objectives of local Title I programs. This has been primarily due to limited interaction between audit and program divisions within Health, Education and Welfare. Interagency attention must be given to developing coordination in areas of Title I program operation and related audit practices. The NACEDC has previously identified specific areas in which improved coordination is desirable. These improvements in the system are less costly, more sensitive and more sensible. Among these were:

(1) audit teams be trained in the program they are to review;

(2) that a program officer from the State be included with the Health, Education and Welfare audit team for the complete audit;

(3) that States be required to spend the amount they would otherwise have had to return to the U.S. Treasury on Title I eligible children in the audited district;

(4) that parent advisory councils of local educational agencies being audited by Health, Education and Welfare have the opportunity to attend the audit exit conference and have the same opportunity as officials to provide written and verbal comments on the draft audit report;

(5) that auditors be required to notify state and/or local compensatory education parent advisory councils when they contact the state educational agency relative to a scheduled audit visit; and,

(6) that a bulletin be published at the state level which is disseminated to state and local parent councils periodically summarizing the scope, findings, recommendations, and disposition of all audits and program reviews.

Implementation of such improvements will enhance local program compliance.

Local program administrators have voiced their dissatisfaction with excessive data collection and reporting requirements. The paperwork compiled is of no practical use in the effective operation of the local program. It is produced simply to facilitate audit reviews. Clarification of the minimum data necessary for federal audits can ease this burden and still produce the documentation necessary for compliance.

Upon completion of the audit, any exceptions identified by the Health, Education and Welfare auditors should be resolved in a timely manner. Lengthy hearing procedures and failure to negotiate recoverable reimbursements have resulted in several millions of dollars in unrecovered federal funds. Local administrators are also frustrated in their desire to understand the findings leading to the exception and recommended modifications in their procedures.

The majority of audit exceptions involve instances of commingling or supplanting of federal funds. Local educational agencies utilize such practices when attempting to integrate Title I activities within the framework of the regular school program. To reduce the likelihood of audit exceptions administrators often institute pullout programs for Title I services. This procedure physically separates the Title I students, teachers and resources.

Existing audit practices are the primary motivation for this determination. Improved auditing techniques and data records could alleviate this administrative practice. The determining factor of Title I pullout procedures or instruction in the regular classroom should be the "highest likelihood of service effectiveness."

Title I programs must respond to state and local regulations in addition to those imposed at the federal level. In many instances federal audit personnel are only knowledgeable of federal regulations, and may view administrative practices responding to state and local educational requirements as improper. Federal audit personnel must become familiar with all guidelines which impact upon the local education agency programs. An isolation of federal regulatory and administrative concerns must be achieved which does not subjugate state and local administrative rights and practices. Federal audit practices should only identify and reflect local program responses to federal requirements.

STATE ADMINISTRATIVE COSTS

The NACEDC recommends that the minimum floor be raised to $250,000 for administrative costs for meeting the federal requirements in the management of Title I at the state level.

Participation in federal programs should not require a disproportionate amount of state funds being applied to administrative costs of the federal programs. The Council has reconsidered the administrative costs provision of Title I, and notes that the floor figure of $150,000 has not been changed since 1966, and needs to be adjusted to reflect cost-of-living increases of the 1970's.

FOOTNOTES

1/ Evaluating Compensatory Education, An Interim Report on the NIE Compensatory Education Study, December 30, 1976. Chapter III, pp. 18-23.

2/ Laws providing Federal financial assistance to local and/or State educational agencies for construction of educational facilities.

a. The Library Services and Construction Act (P.L. 93-380);

b. The Vocational Education and NIE Amendments of 1976 (P.L. 94-482);

c. Emergency School Aid Act (P.L. 92-318);

d. School Construction in Areas affected by Federal Activities (P.L. 815);

e. Economic Development Act of 1976 (P.L. 94-487); and,

f. Local Public Works Capitol Development and Investment Program of 1976 (P.L. 94-369).

3/ Statistics summarized from Office of Education Title I Allocation Report.

4/ "Can We Afford Deficient Evaluations?" An Interim Report by NACEDC, January 23, 1976.

SUMMARY OF PAST COUNCIL RECOMMENDATIONS

(1966-1976)

PARENTAL INVOLVEMENT

NACEDC has supported meaningful parental involvement relating to educational services for eligible children in the past by recommending that parent advisory councils be mandated at the local educational level with representatives on a district-wide level; that these parent advisory councils receive appropriate provisions and guarantees of technical assistance and access to public information; that parent advisory councils be involved in the planning, development, operation and evaluation of compensatory education programs; that local initiative be maintained so that programs are developed to meet the specific needs of educationally deprived children; and inservice training of parent advisory council members be mandated and provided for by special incentive grants through states.

FEDERAL RESPONSIBILITY FOR SPECIAL CHILDREN

The Council has consistently supported federal responsibility for special children by recommending that the Office of Education accumulate data on migrant children and utilize that data for effective delivery of services; that a comprehensive migrant program be mandated and that the Uniform Migrant Student Record Transfer System (UMSRTS) be used in determining the number of children served for funding purposes and that a bilingual educational component be included in the migrant program.

NACEDC recommended that compensatory education legislation contain mandates for nonpublic school children's participation and that nonpublic school administrators be involved in the total planning process for compensatory education projects and also recommended that a bypass mechanism be provided when there is a failure to provide nonpublic school children with effective participation on an equitable basis in Title I programs.

The Council has recommended that federally funded programs for neglected and delinquent children be reviewed and consolidated; that similar studies be consolidated at the Department of Justice; that public programs be set up to train early childhood center personnel to identify and refer abused and neglected children to authorities; that program eligibility requirements be clarified so that institutionalized children's needs will be met from year to year and that an educational component be included in the Juvenile Justice and Delinquency Prevention Act of 1974.

CLARIFICATION OF OBJECTIVES

The Council has recommended against general aid of federal funds to schools, compensatory education is a proven need and should hold federal priority; Council has endorsed concentrating funds where the need is greatest so limited dollars have a genuine impact rather than being dissipated in laudable, but inconclusive efforts. Council has not recommended set objectives for Title I other than raising the educational level of educationally disadvantaged children.

TITLE I FUNDS AND CONSTRUCTION

The Council has recommended against general aid of federal funds to schools, but has not recommended specifically that Title I funds not be spent on construction of schools for Title I programs.

COMPARABILITY

The Council has supported the concept of comparability as a viable requirement for federal education programming accountability and should be retained. Comparability reviews should reflect comparable inputs of services to children, not merely count the numbers of teachers and textbooks; and should be expanded to include the concept that the child's special education needs are being met by State and local funds.

EFFECTIVE USE OF FUNDS: EVALUATIONS

The Council has devoted an Interim Report to the subject of evaluations because it is an essential element of the effective and sustained upgrading of program performance. It has pointed out that the practice of evaluations, requires great care and the government can learn some valuable operational lessons for this and other occasions: the need to plan well allowing ample time to carry out the plan well; the need to coordinate, the need to derive maximum value from existing sources and records, the need to insist on representativeness, the need to structure the evaluation so that it really measures lasting impact, the need to imaginatively consider alternatives, and the need to truly welcome and involve public participation.

DISTRIBUTION OF FUNDS

Council's past recommendations are in keeping with the present recommendations. Council has recommended that Title I ensure that those children who are most economically deprived be served first, and that funds be concentrated where the need is greatest. However, no specific recommendation has been made to deny Title I funding for construction or noninstructional services before.

FUNDING FORMULA

The past recommendations of the Council were concerned with facilitating the effective delivery of service to educationally disadvantaged children. Previous recommendations include: the use of AFDC statistics in the Title I formula which would indicate those children from families in excess of the Orshansky index; and the provision that all deprived children from families with incomes the same or lower than the Orshansky index be eligible; also in-kind benefits received by those families in poverty be counted as income for the purposes of eligibility for poverty-based federal programs. The Council has supported plans to update the present way of counting Title I children and proposals for change for the most equitable formula possible. It has also stated that a single standard of poverty based upon poverty statistics for use in federal funding would simplify matters.

SANCTIONS FOR NONCOMPLIANCE

The Council has recommended sanctions for noncompliance in the past by requiring states to spend from their own funds an amount equivalent to the audit exception on Title I eligible children according to Title I regulations in the local educational agencies where the questionable expenditures occurred.

STATE ADVISORY COUNCILS

Council has recommended the formation of State Advisory Councils to work closely in the preparation of the State Plan (or Application, whichever results). Council has also recommended that state advisory councils include elected members of mandated parent advisory councils for Title I who are representative of parents of children from low-income families.

INDIVIDUALIZED NEEDS ASSESSMENT

NACEDC has recommended that the local role should be that of program design and individual needs assessment of the disadvantaged child in partnership with the parents. Council also has recommended that legislation and guidelines emphasize alternative educational models which maximize individualization of instruction and wherein performance, related to expenditures, will be considered the basis for determining program effectiveness; and Council has considered individualized needs assessment which determine the development of programs to meet the specific identified needs of educationally deprived children to be a key provision in the Title I program.

TITLE I—FINANCIAL ASSISTANCE TO LOCAL EDUCATIONAL AGENCIES FOR THE EDUCATION OF CHILDREN OF LOW-INCOME FAMILIES

DECLARATION OF POLICY

SEC. 101. In recognition of the special educational needs of children of low-income families and the impact that concentrations of low-income families have on the ability of local educational agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in the following parts of this title) to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children.

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Council Members

	Term of Office
Dean Owen F. Peagler, Chairman New York, N.Y.	1978
Dr. Wilbur H. Lewis, Vice Chairman Tucson, Arizona	1978
Mrs. Carol Schwartz, Vice Chairman Washington, D.C.	1977
Mr. John Calhoun Wheaton, Maryland	1979
Mrs. Mary Anne Clugston Waterflow, New Mexico	1977
Mr. J. Alan Davitt Delmar, New York	1978
Mrs. Dorothy M. Fleegler Boca Raton, Florida	1978
Mrs. Sarah M. Greene Knoxville, Tennessee	1978
Mrs. Barbara Kilberg McLean, Virginia	1979
State Senator John Leopold Honolulu, Hawaii	1979
Mrs. Rosella Lipson Beverly Hills, California	1977
Mr. Marvin Pomerantz Des Moines, Iowa	1979
Mr. Ben Reifel Sioux Falls, S. D.	1977
Dr. George Willeford Austin, Texas	1977
Mr. M. Alan Woods Alexandria, Virginia	1979

Mrs. Roberta Lovenheim
Executive Director